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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

<p>In re:</p> <p>G-I HOLDINGS INC., <u>et al.</u>,</p> <p>Debtors.</p>	<p>In Proceedings for Reorganization under Chapter 11</p> <p>Hon. Rosemary Gambardella, U.S.B.J.</p> <p>Bankruptcy Case Nos. 01-30135 (RG) and 01-38790 (RG) (Jointly Administered)</p> <p><b>NOTICE OF MOTION OF G-I HOLDINGS INC. FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 9019(a) AND BANKRUPTCY CODE § 363 APPROVING SETTLEMENT AGREEMENT WITH CENTURY INDEMNITY COMPANY AND AUTHORIZING THE SALE OF INSURANCE POLICY RIGHTS FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS AND OTHER ENCUMBRANCES</b></p> <p><b>Hearing Date: May 27, 2008 at 11:00 a.m.</b></p> <p><b>Oral Argument: Requested, if Objection</b></p>
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TO: THE HONORABLE ROSEMARY GAMBARDELLA, UNITED STATES  
BANKRUPTCY JUDGE

CREDITORS REQUESTING NOTICE AND OTHER PARTIES-IN-INTEREST

**PLEASE TAKE NOTICE** that on the 27<sup>th</sup> day of May, 2008 at 11:00 a.m. or as soon thereafter as counsel may be heard, the undersigned Dewey & LeBoeuf LLP and Riker Danzig Scherer Hyland & Perretti LLP, co-counsel for G-I Holdings Inc. (“G-I” or the “Debtor”), shall move before the Honorable Rosemary Gambardella, at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building and Courthouse, 50 Walnut Street, 3<sup>rd</sup> Floor, Courtroom E, Newark, New Jersey 07102 seeking the entry of an order pursuant to Bankruptcy Rule 9019(a) and Bankruptcy Code § 363 Approving Settlement Agreement with Century Indemnity Company and Authorizing the Sale of Insurance Policies Free and Clear of Liens, Claims, Interests and Other Encumbrances (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that, in support of the Motion, the Debtor shall rely on the Affidavit of Anthony Bartell filed herewith. A proposed form of order is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that no brief is necessary as there are no contested issues of law or fact.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-1(d), objections, if any, to the Motion shall be filed with the Clerk of the Bankruptcy Court and shall be served upon the undersigned at least seven (7) days prior to the return date set forth above, and in the absence of the filing of any objections, the relief requested by G-I may be granted.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J.

LBR 9013-1(f), G-I hereby waives oral argument unless an objection is filed.

Dated: May 7, 2008  
Morristown, New Jersey

RIKER, DANZIG, SCHERER, HYLAND  
& PERRETTI LLP

By: /s/ Dennis J. O'Grady  
Dennis J. O'Grady, Esq. (DO 7430)

-and-

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